

1 **GREENBERG TRAURIG, LLP**
Jordan D. Grotzinger (SBN 190166)
2 grotzingerj@gtlaw.com
Robert J. Herrington (SBN 234417)
3 herringtonr@gtlaw.com
4 1840 Century Park East, Suite 1900
Los Angeles, California 90067
5 Telephone: 310.586.7700
Facsimile: 310.586.7800
6

7 J. Blake Cunningham (SBN 261559)
cunninghamb@gtlaw.com
8 4 Embarcadero Center, Suite 3000
San Francisco, California 94111-5983
9 Telephone: 415.655.1300
Facsimile: 415.707.2010
10

Attorneys for Defendant
11 GLOBAL TEL*LINK CORPORATION
12

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION
16
17

18 CORRIN RANKIN D/B/A OUT NOW
BAIL BONDS,

19 Plaintiff,

20 v.

21 GLOBAL TEL*LINK CORPORATION
22 AND DOES 1-50,

23 Defendants.
24

Case No. C 13-01117 JCS

**STIPULATION TO EXTEND RESPONSIVE
PLEADING DEADLINE BY EIGHT DAYS**

[L.R. 6-1(a)]

25
26
27
28

STIPULATION TO EXTEND RESPONSIVE PLEADING DEADLINE

Defendant Global Tel*Link Corporation ("Defendant") removed this action to this Court on March 12, 2013. Pursuant to a stipulation filed in this action in state court and attached to the Notice of Removal, Defendant has up to and including March 28, 2013 to answer or otherwise respond to the Complaint. Pursuant to Local Rule 6-1(a), the parties hereby stipulate that Defendant shall have an additional eight days, up to and including April 5, 2013, in which to answer or otherwise respond to the Complaint. This stipulation will not alter the date of any event or any deadline already fixed by Court order.

Dated: March 26, 2013

GREENBERG TRAURIG, LLP

By: _____

Jordan D. Grotzinger
Attorneys for Defendant
GLOBAL TEL*LINK CORPORATION

Dated: March 26, 2013

GLAZNER & RYAN

By: _____

Maureen Pettibone Ryan
Attorneys for Plaintiff
CORRIN RANKIN D/B/A OUT NOW BAIL
BONDS

Dated: 4/2/13



STIPULATION TO EXTEND RESPONSIVE PLEADING DEADLINE

PROOF OF SERVICE**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a party to the within action; my business address is 1840 Century Park East, Suite 1900, Los Angeles, California 90067.

On March 27, 2013, I served the documents described as:

STIPULATION TO EXTEND RESPONSIVE PLEADING DEADLINE BY EIGHT DAYS [L.R. 6-1(a)]

on the following interested parties in this action addressed as follows:

Maureen Petibone Ryan
GLAZNER & RYAN
333 Bradford Street, Suite 190
Redwood City, CA 94063
mryan@glaznerryanlaw.com

J. Blake Cunningham
GREENBERG TRAURIG, LLP
4 Embarcadero Center, Suite 3000
San Francisco, CA 94111-5983
cunninghamb@gtlaw.com

☐ **(BY E-MAIL)**

On March 27, 2013, I transmitted the foregoing document(s) by E-mail to the parties at their respective e-mail addresses as indicated above. The document was served electronically and the transmission was reported complete and without error.

☐ **(BY CM/ECF)**

Pursuant to CM/ECF System, registration as a CM/ECF user constitutes service through the Court's transmission facilities. The Court's CM/ECF system sends an e-mail notification of the filing to the parties and counsel of record listed above who are registered with the Court's EC/ECF system.

☐ **(BY FEDERAL EXPRESS)** I am readily familiar with the business practice of my place of employment in respect to the collection and processing of correspondence, pleadings and notices for delivery by Federal Express. Under the practice it would be deposited with Federal Express on that same day with postage thereon fully prepared at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if delivery by Federal Express is more than one day after date of deposit with Federal Express.

1 ☐ **(BY MAIL)**

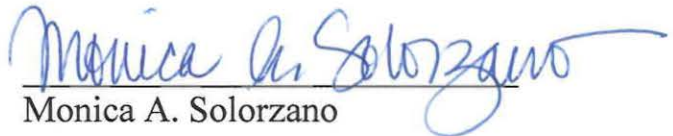
2 ☐ I deposited such envelope in the mail at Los Angeles, California. The envelope
3 was mailed with postage thereon fully prepaid.

4 ☐ I am readily familiar with the business practice of my place of employment in
5 respect to the collection and processing of correspondence, pleadings and
6 notices for mailing with United States Postal Service. The foregoing sealed
7 envelope was placed for collection and mailing this date consistent with the
8 ordinary business practice of my place of employment, so that it will be picked
9 up this date with postage thereon fully prepaid at Los Angeles, California, in
10 the ordinary course of such business.

11 ☐ **(STATE)** I declare under penalty of perjury under the laws of the State of
12 California that the foregoing is true and correct.

13 ☒ **(FEDERAL)** I declare under penalty of perjury that the foregoing is true and
14 correct, and that I am employed at the office of a member of the bar of this Court
15 at whose direction the service was made.

16 Executed on March 27, 2013, at Los Angeles, California.

17 
18 Monica A. Solorzano